

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Uniformed Fire Officers Association, *et al.*,

Petitioners/Plaintiffs,

-against-

Bill de Blasio, in his official capacity as Mayor of
the City of New York, *et al.*,

Respondents/Defendants.

Case No. 1:20-cv-05441-KPF

**MOTION FOR LEAVE TO FILE
BRIEF OF AMICI CURIAE
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS AND
31 MEDIA ORGANIZATIONS**

The Reporters Committee for Freedom of the Press, Advance Publications, Inc., The Associated Press, Atlantic Media, Inc., Boston Globe Media Partners, LLC, BuzzFeed, CBS Broadcasting Inc., on behalf of CBS News and WCBS-TV, The Center for Investigative Reporting (d/b/a Reveal), Daily News, LP, Dow Jones & Company, Inc., The E.W. Scripps Company, First Amendment Coalition, Gannett Co., Inc., International Documentary Association, Investigative Reporting Workshop at American University, Los Angeles Times Communications LLC, The Media Institute, MediaNews Group Inc., Mother Jones, MPA - The Association of Magazine Media, National Newspaper Association, National Press Photographers Association, New York News Publishers Association, The News Leaders Association, Newsday LLC, Penguin Random House LLC, POLITICO LLC, Radio Television Digital News Association, Society of Environmental Journalists, Society of Professional Journalists, Tully Center for Free Speech, and The Washington Post (collectively, "amici") respectfully move this Court for leave to file the accompanying brief as amici curiae in opposition to Petitioners/Plaintiffs' motion for a preliminary injunction.

Petitioners/Plaintiffs do not oppose the filing of the brief; Respondents/Defendants take no position on the filing of the brief.

The accompanying brief seeks to underscore for the Court the importance of access to police disciplinary records for journalists and the public. As representatives of the press and advocates for the First Amendment and the newsgathering rights of the news media, amici are gravely concerned that the preliminary injunction sought by Petitioners/Plaintiffs will further restrict the free flow of information to the public with respect to records of police misconduct—records that for too long have been shielded from public scrutiny. In their proposed brief, amici explicate the value of access to such records for journalists.

Accordingly, amici respectfully request that the Court grant this motion and accept the accompanying brief for its consideration. *See, e.g., Picard v. Greiff*, 797 F. Supp. 2d 451, 452 (S.D.N.Y. 2011) (“It is well-established that a district court has broad discretion to grant or deny an appearance as *amicus curiae* in a given case.” (citation omitted)).

Dated: August 14, 2020

Respectfully submitted,

/s/ Katie Townsend
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